

1 DANIEL BRODERICK, Bar #89424  
2 Federal Defender

3 CARO MARKS, Bar #159267  
4 Assistant Federal Defender  
5 Designated Counsel for Service  
6 801 I Street, 3rd Floor  
7 Sacramento, California 95814  
8 Telephone: (916) 498-5700

9 Attorney for Defendant  
10 MICHAEL LABRECQUE

11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14  
15 UNITED STATES OF AMERICA, ) No. Cr-S-03-384 WBS  
16 v. Plaintiff, )  
17 MICHAEL LABRECQUE, et al. ) STIPULATION AND ORDER TO CONTINUE  
18 Defendants. ) STATUS CONFERENCE RE JURY  
19 ) QUESTIONNAIRE  
20 ) Date: October 29, 2007  
21 ) Time: 8:30 a.m.  
22 ) Judge: Hon. William B. Shubb  
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30 MICHAEL LABRECQUE, by and through his counsel, Caro Marks,  
31 Juliette LaBrecque, by and through her counsel Jan Karowsky, Allan  
32 Harrod, by and through his counsel, Bruce Locke, and the United States  
33 of America, by and through its counsel, Laurel White, hereby stipulate  
34 and agree to continue the hearing presently scheduled for October 15,  
35 2007, for two weeks until October 29, 2007. Counsel for Defendant  
36 Labrecque and counsel for the government are currently in trial, and a  
37 two-week continuance is necessary so all counsel can participate in  
38 drafting the parties' joint statement regarding the nature of the case  
39 to be presented by the Court to the jury, and proposed jury questions

1 to be tendered to the potential jurors by the Court. These two filings  
2 were due on October 9, 2007, but due to the parties' trial schedules,  
3 the parties were unable to meet and confer on these joint filings.  
4 Therefore, the parties stipulate and agree the filings shall be  
5 submitted to the Court no later than October 22, 2007. The hearing  
6 shall be set for October 29, 2007, at 8:30 a.m..

7 The Court has already excluded time under the Speedy Trial Act  
8 from September 10, 2007, until December 11, 2007 (See Docket, #165).  
9 Such exclusion shall remain in effect.

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1 All defense counsel and counsel for the government concur in the  
2 need for this continuance.

3 Dated: October 10, 2007

4 Respectfully submitted,

5 DANIEL BRODERICK  
Federal Defender

7 /s/ Caro Marks

8 CARO MARKS  
9 Assistant Federal Defender  
Attorney for Defendant  
MICHAEL LABRECQUE

10 /s/ Jan Karowsky

11 JAN KAROWSKY  
12 Attorney at Law  
13 Attorney for Defendant  
JULIETTE LABRECQUE

14 /s/ Bruce Locke

15 BRUCE LOCKE  
16 Attorney at Law  
17 Attorney for Defendant  
ALLAN HARROD

18 /S/ Laurel White

19 LAUREL WHITE  
20 Assistant United States Attorney

21 ORDER

22 IT IS SO ORDERED.

23 Dated: October 12, 2007

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25 WILLIAM B. SHUBB  
26 UNITED STATES DISTRICT JUDGE